

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA  
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR  
SYSTEMS PRODUCTS LIABILITY  
LITIGATION

Master File No. 2:12-MD-02327  
MDL 2327

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ETHICON WAVE 2 CASES LISTED IN  
PLAINTIFFS' EXHIBIT A<sup>1</sup>

JOSEPH R. GOODWIN U.S. DISTRICT  
JUDGE

**NOTICE OF ADOPTION OF PRIOR *DAUBERT* RESPONSE REGARDING  
CHRISTOPHER RAMSEY, M.D. FOR WAVE 2**

Defendants Ethicon, Inc. and Johnson & Johnson (Ethicon) hereby adopt and incorporate by reference the *Daubert* response filed in relation to the general-causation opinions of Christopher Ramsey, M.D. for Ethicon Wave 1, Dkt. 2263. Ethicon respectfully requests that the Court deny Plaintiffs' motion, for the reasons expressed in the Wave 1 response briefing.

Dated: August 5, 2016

Respectfully submitted,

ETHICON, INC. AND  
JOHNSON & JOHNSON

/s/ Rita A. Maimbourg

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<sup>1</sup> With the exception of two cases that have been dismissed: Sebrina Slade, Case No. 2:12-cv-01753 and Phyllis Bowles, Case No. 2:12-cv-01865.

/s/ David B. Thomas

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**CERTIFICATE OF SERVICE**

I certify that on August 5, 2016, I electronically filed this document with the clerk of the court using the CM/ECF system, which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

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